

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY et. al.,

Defendants.

Case No.: 7:20-CV-00947-DCC

PLAINTIFFS' MOTION TO SEAL

Under Local Civil Rule 5.03 of the United States District Court District of South Carolina, Plaintiffs Jane Does 1-9 hereby move the Court to seal Exhibits 1-6 and the unredacted response in opposition to Defendants' MG Freesites Ltd. and Mindgeek S.à.r.l.'s (Pornhub Defendants) motion to compel independent medical examinations of the Does. The aforementioned exhibits and redacted material in the response brief are either confidential documents under paragraph 4 or contain confidential information under paragraph 3 of the Confidentiality Order (DE 138) that require the Court's order to disclose.

A memorandum of law in support of the Does' motion is attached, as required by Local Civil Rule 5.03. Under section 13.4.3 of the Court's Electronic Case Filing Policies and Procedures and Local Rule 7.02, the Does' counsel provided appropriate notice to counsel for the Pornhub Defendants about the Does' need to file the foregoing confidential materials, and the Pornhub Defendants' counsel consented to filing such material under seal.

A non-confidential descriptive index of documents the Does seeks to file under seal is attached hereto as **Exhibit 1**. Under Section 8.1 of the Court's Electronic Case Filing Policies and Procedures, copies of the documents that the Does seek to seal through this motion will be

emailed to chambers for an in-camera review and will not be filed on the docket.

By filing below, counsel certifies that he has complied with Local Civil Rule 5.03 in filing this motion. WHEREFORE, the Does respectfully request that the Court grant their motion and allow the documents identified in the index attached hereto as Exhibit 1 be filed under seal with the Court.

Respectfully submitted,

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June 10, 2024
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